



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

June 25, 2007

Reply to
Attn Of: ETPA-088

Ref: 05-017-AFS

Jeannie Blackmore, IDT Leader
Ketchikan-Misty Fiords Ranger District
Tongass National Forest
3031 Tongass Avenue
Ketchikan, AK 99901

Dear Ms. Blackmore:

The U.S. Environmental Protection Agency (EPA) has reviewed the **final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Traitors Cove Timber Sale** (CEQ No. 20070195) on Revillagigedo Island in the Tongass National Forest in southeast Alaska. This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. A modified version of an alternative to the proposed action (Alternative 2) was selected by the Forest Service (FS) in the FEIS and ROD.

In our comments on the draft EIS in July 2006, EPA expressed environmental concerns with the proposed action (Alternative 2) due to the potential for cumulative water quality impacts. We recommended that the FS consider selecting a modified alternative, or Alternative 3 or 4, which would reduce the timber harvest volume and corresponding impact to the coastal watersheds. We also requested that the final EIS provide certain clarifying information regarding the preferred alternative, particularly in relation to cumulative impacts of other activities adjacent to the project area (e.g., Klam timber sale). Lastly, EPA recommended that the discharge permit requirements for the Marine Access Facilities be included in the FEIS.

The FS has identified the proposed alternative (Alternative 2), with modifications, as its selected alternative in the FEIS and ROD. In its decision, the FS has removed Unit S07 because of multiple resource concerns, including identified cultural and traditional uses (e.g., culturally modified trees) and the largest known population of *Plantanthera orbiculata* (lesser round-leaf orchids) in the State of Alaska. Additionally, the boundary of three small Old-growth Reserves will be revised through a non-significant amendment to the Forest Plan.

In response to EPA's comments on the draft EIS, the FS has clarified the relationship of the Traitors Cove timber sale with other projects in adjacent watersheds. EPA supports the FS decision to combine the smaller projects in areas surrounding the Traitors Cove project area for larger scale analysis. We also support the changes made to Alternative 2 in the FEIS,

particularly in light of the concerns voiced by numerous tribal governments and native entities in vicinity of the project area. We also acknowledge that the FS has included the permit conditions for the Marine Access Facilities in the FEIS.

Overall the responses provided in the FEIS do respond to our comments on the draft EIS. EPA recognizes that even with the modification, however, Alternative 2 has the potential to cause cumulative impacts to water quality, and we continue to have concerns regarding these impacts. While some of these impacts may be reduced through best management practices, they will not be reduced to the levels that could be achieved under some of the other alternatives.

Thank you for the opportunity to review and comment on this FEIS and ROD. If you would like to discuss these comments in detail, please contact Jennifer Curtis at (907) 271-6324.

Sincerely,

//s//

Christine Reichgott, Manager
NEPA Review Unit

